

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

-----X  
In re: :  
 : Chapter 13  
 THOMAS STAFFORD, :  
 : Bankruptcy No. 18-12948 (MDC)  
 Debtor. :  
-----X

**ENTRY OF APPEARANCE OF THE CITY OF PHILADELPHIA COMBINED  
WITH DEMAND FOR SERVICE OF PAPERS**

TO THE CLERK OF THE BANKRUPTCY COURT:

Kindly enter the appearance of MEGAN N. HARPER, Esquire as counsel of record for creditor The City of Philadelphia and/or the Water Revenue Department in the above captioned matter.

PLEASE TAKE NOTICE that the City of Philadelphia, (the “City”), a creditor and party-in-interest in the above-captioned case, hereby appears in the above-captioned case by its counsel, Megan N. Harper, Deputy City Solicitor; such counsel hereby enters their appearance pursuant to Title 11 of the United States Code, 11 U.S.C. § 101 et seq. (the “Bankruptcy Code”) and Fed. R. Bankr. P. 9010 (b), and such counsel hereby requests, pursuant to Fed. R. Bankr. P. 2002, 3017, 9007 and § 342 of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the captioned case and served upon the City and to the attorney at the address and telephone number set forth below.

This Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a waiver of Creditor’s rights: (1) to have final orders in noncore matters entered only after de novo review by a District Judge; (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (3) to have the District Court

withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, setoffs, or recoupments to which Creditor is or may be entitled, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments Creditor expressly reserves.

Respectfully submitted,

THE CITY OF PHILADELPHIA

Dated: October 29, 2018

By: /s/ Megan N. Harper  
MEGAN N. HARPER  
Deputy City Solicitor  
PA Attorney I.D. 81669  
Attorney for the City of Philadelphia  
City of Philadelphia Law Department  
Municipal Services Building  
1401 JFK Boulevard, 5<sup>th</sup> Floor  
Philadelphia, PA 19102-1595  
215-686-0503 (phone)  
Email: Megan.Harper@phila.gov